

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

PRINCE ODURO

Case No.

2:22-mj-79

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 04/07/2015 - 05/01/2019 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1344
 18 U.S.C. § 1028A
 18 U.S.C. § 1956(a)(1)(B)(i)

Bank Fraud
 Aggravated Identity Theft
 Money Laundering

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Shawn A. Mincks

Complainant's signature

Shawn Mincks, Special Agent, IRS-CI

Printed name and title

Sworn to before me and signed in my presence. VIA Facetime

Date:

2/9/2022

City and state:

Columbus, Ohio

Elizabeth A. Preston Deavers
 United States Magistrate Judge

Judge's signature

Elizabeth A. Preston Deavers, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**AFFIDAVIT
IN SUPPORT OF CRIMINAL COMPLAINT**

I, Shawn Mincks, Special Agent, U.S. Department of the Treasury, Internal Revenue Service, Criminal Investigation, being duly sworn, depose and say that:

Introduction and Purpose

1. I am a Special Agent with IRS-Criminal Investigation and have been so employed since 2008. I have received specialized law enforcement training at the Federal Law Enforcement Training Center, Glynco, Georgia and additional specialized training from the IRS. My duties as a Special Agent include conducting investigations of individuals and businesses that have violated Federal Law, particularly those laws found under Title 18, Title 26 and Title 31 of the United States Code. I have participated in multiple such investigations, including several investigations related to individuals who launder funds derived from fraud schemes.
2. I am assigned to pursue a federal criminal investigation of Prince Oduro. I make this affidavit in support of the filing of a criminal complaint against Oduro and contend there is probable cause to believe that he has committed violations of 18 U.S.C. § 1344, Bank Fraud; 18 U.S.C. § 1028A, Aggravated Identity Theft; and 18 U.S.C. § 1956(a)(1)(B)(i), Money Laundering. Because this affidavit is being submitted for the limited purpose of filing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to support sufficient probable cause for the requested criminal complaint.
3. Through interviews, executions of search warrants and analysis of financial and other documentation, I believe the investigation to date tends to show that:
 - a. Oduro used his position as an employee of JP Morgan Chase Bank to defraud a JP Morgan Chase Bank customer, in violation of 18 U.S.C. § 1344;
 - b. Oduro created PayPal accounts using compromised Social Security Numbers, then Oduro and/or parties known to Oduro defrauded other individuals by transferring funds from compromised bank accounts into the PayPal accounts, in violation of 18 U.S.C. § 1028A;
 - c. Oduro laundered the funds received into the PayPal accounts, in violation of 18 U.S.C. § 1956(a)(1)(B)(i), and;

- d. Oduro agreed to receive and disburse funds derived from an Email fraud scheme, which was facilitated through interstate and/or international wire communications, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Bank Fraud

4. In 2015, Oduro worked at JP Morgan Chase Bank. According to JP Morgan Chase Bank records, on April 7, 2015, at approximately 5:30 PM, through his employment at JP Morgan Chase Bank located in Columbus, Ohio, Oduro accessed the JP Morgan Chase Bank customer profile of Person 21. Person 21 controlled three bank accounts at JP Morgan Chase Bank: JPMC xx8806, JPMC xx7365, and JPMC xx5884.
5. According to JP Morgan Chase Bank records, at approximately 10:22 PM that same day, a call was made to access JPMC xx8806 from phone number 614-779-8584. This same phone number would be used to access Person 21's accounts on 20 different days between April 7, 2015 and September 25, 2015. Capital One records show that Oduro listed this number as his when he opened a Capital One credit card in October of 2015.
6. PayPal records show that on May 16, 2015, PayPal account # xx1356 (PayPal xx1356) was established in the name of Person 21 using Person 21's Social Security Number. The address 2677 Club Lane Drive, Columbus, Ohio would be added to the account later. Capital One credit card records show that this address was Oduro's address from at least November of 2014 through July of 2015.
7. PayPal records show that between June 29, 2015 and August 27, 2015, PayPal xx1356 was accessed numerous times from IP address 104.230.141.26. This same IP address was used to access a PayPal account in Oduro's name on June 11, 2015.
8. PayPal and JP Morgan Chase Bank records show that between June 29, 2015 and July 24, 2015, \$7,000 was transferred from JPMC xx7365 to PayPal xx1356. Person 21 would later dispute these transfers, and the funds would be returned to JPMC xx7365 at a loss to JP Morgan Chase Bank. After the funds were transferred to PayPal xx1356, they were withdrawn in cash via JP Morgan Chase Bank ATMs located in Columbus, Ohio and through transactions at Giant Eagle grocery store locations in Columbus, Ohio.
9. PayPal and JP Morgan Chase Bank records show that on August 17 and August 18, 2015, a total of \$5,500 was transferred from JPMC xx8806 to the PayPal xx1356.
10. JP Morgan Chase Bank records show that on August 19, 2015, \$8,000 was transferred from JPMC xx5884 to JPMC xx8806 via telephone transfer. The transfer was requested by a caller using phone number 614-779-8584, which, as stated above, was the number Oduro listed as his when he opened a Capital One credit card in October of 2015. PayPal records show that on August 20, 2015, an \$8,000 transfer from JPMC xx8806 to PayPal xx1356 was attempted but denied.

11. PayPal records show that on August 19, 2015, a check in the amount of \$630.00 was issued from PayPal xx1356. JP Morgan Chase Bank records show that on August 31, 2015, Oduro deposited a check issued by PayPal to Person 21 in the amount of \$630.00 into JP Morgan Chase Bank account # xx8363 (JPMC xx8363) via an ATM deposit at a branch located in Columbus, Ohio. JP Morgan Chase Bank records show that Oduro opened JPMC xx8363 on June 26, 2015 at a branch located in Columbus, Ohio. He was the only signer on the account.
12. PayPal records show that on August 20, 2015, a check in the amount of \$500.00 was issued from PayPal xx1356. JP Morgan Chase Bank records show that on September 24, 2015, Oduro deposited a check issued by PayPal to Person 21 in the amount of \$500.00 into JP Morgan Chase Bank account # xx5893 (JPMC xx5893). Bank records show that Oduro opened JPMC xx5893 on September 22, 2015 and was the only signer on the account.

PayPal Fraud Scheme - Aggravated Identity Theft and Money Laundering

13. In 2017, Oduro used means of identification, including names, social security numbers, and addresses of individuals without their knowledge or consent to open additional accounts with PayPal, and then used the accounts to unlawfully receive funds.

Person 26 and Person 27

14. PayPal records show that on March 27, 2017, PayPal account # xx6280 (PayPal xx6280) was opened in the name of Person 26 using the Social Security Number of Person 26 and email address gaydys6@outlook.com. The mailing address associated with PayPal xx6280 was 777 Worthington Woods Boulevard, Apartment 215, Columbus, Ohio. The account was created from IP address 173.88.108.51. This same IP address would be used to access the account numerous times between March 27, 2017 and April 26, 2017.
15. Charter Communications records show that IP address 173.88.108.51 was assigned to a subscriber at 777 Worthington Woods Boulevard, Apartment 215, Columbus, Ohio between January 12, 2017 and July 15, 2017. The email address for the subscriber account was jrand76110@gmail.com. The phone number for the subscriber account was 614-966-0372. Wal-Mart records show that this phone number belonged to Oduro.
16. On April 26, 2017 at approximately 5:15 PM Central Daylight Time, \$1,000 was transferred to PayPal xx6280 from a USAA Bank account in the name of Person 27. All the funds were exhausted within 60 minutes through a JP Morgan Chase Bank ATM withdrawal and transactions conducted at four different Wal-Mart locations, all of which occurred in and around Columbus, Ohio.
17. Person 27 was interviewed and stated that he/she does not know Person 26, and he/she did not authorize the transaction to the PayPal account. He/She noticed the transaction only after receiving his/her monthly statement from USAA. Upon noticing the transfer,

he/she had his/her spouse call USAA to report the fraudulent transfer. USAA returned the funds to him/her after approximately a month.

18. Conspirator 8 was the lessee of 777 Worthington Woods Boulevard, Apartment 215, Columbus, Ohio. On May 3, 2017, the Grove City Police Department executed a search warrant at the address. Oduro was present during the execution of the search warrant and later stated to federal agents that he lived at the address at the time of the execution of the warrant. During the execution of the warrant, the Grove City Police Department seized a PayPal card issued in the name of Person 26.
19. Oduro's phone was also seized during the execution of the search warrant by the Grove City Police Department. IRS-CI later executed a search warrant on the phone. The phone was found to contain a text message conversation between Oduro and "Idris" that occurred between April 8, 2017 and May 2, 2017. During the conversation, Oduro and Idris appear to discuss the fraudulent activities involving PayPal, Person 26 and Person 27, including the following excerpts:
 - a. On April 26, 2017 at approximately 5:16 PM Central Daylight Time, Idris sent Oduro a text message stating, "1k dey there now." Oduro responded, "Yeah on my way to cash out."
 - i. As stated in paragraph # 16, PayPal records show that on April 26, 2017 at approximately 5:15 PM Central Daylight Time, \$1,000 had been transferred to PayPal xx6280, in the name of Person 26, from a USAA Bank account in the name of Person 27.
 - b. On April 26, 2017 at approximately 5:24 PM Central Daylight Time, Oduro sent Idris a text message stating, "At work."
 - i. As referenced in paragraph # 16, PayPal records show that between 5:23 PM Central Daylight Time and 6:15 PM Central Daylight Time, Oduro expended all funds in PayPal xx6280 through a cash withdrawal and transactions conducted at Wal-Mart.

Person 28, Person 29 and Person 30

20. PayPal records show that on April 4, 2017, PayPal account # xx7126 (PayPal xx7126) was opened in the name of Person 28 using Person 28's Social Security Number and email address jrand76110@outlook.com.
 - a. This email address uses the same naming convention—using jrand76110—as the email address associated with the IP address 173.88.108.51 per Charter Communication records as described in paragraph #15. This email address used the domain @outlook.com, while the address in paragraph #15 used the domain @gmail.com.

21. PayPal records show that PayPal xx7126 was created from IP address 173.88.108.51. This same IP address would be used to access the account numerous times between April 4, 2017 and June 9, 2017. As previously stated, this IP address is also linked to PayPal xx6280 (in the name of Person 26) and to 777 Worthington Woods Boulevard, Apartment 215, Columbus, Ohio.
22. PayPal records show that on May 26, 2017 and various dates in June of 2017, PayPal xx7126 was accessed from IP address 104.184.20.152. FedEx records show that this IP address was used to track a FedEx Express package bound for Oduro at 9262 Worthington Road, Apt 306, Westerville, Ohio from July 11, 2017 through July 14, 2017. The package arrived on July 13, 2017 and was signed for by "P. Oduro." This IP address was also used to access a PayPal account in Oduro's name on June 2, 2017.
23. The Grove City Police Department seized a PayPal card in the name of Person 28 during the execution of the search warrant at 777 Worthington Woods Boulevard, Apartment 215, Columbus, Ohio on May 3, 2017. PayPal records show that on May 26, 2017, after the execution of the search warrant, the card linked to this account was reported as lost. A new card was issued as a result.
24. PayPal records show that on June 8, 2017 at 11:19 PM Central Daylight Time and on June 9, 2017 at 12:01 AM Central Daylight Time, a total of \$1,999.00 was transferred from Person 29's USAA Bank account to PayPal xx7126. Within 35 minutes, \$400 was withdrawn at a PNC Bank ATM. The rest of the funds were exhausted through transactions conducted at Wal-Mart. All the transactions occurred at locations in and around Columbus, Ohio.
25. Person 29 was interviewed and stated that somebody siphoned money from his/her Citizen's Bank account through his/her USAA account. As soon as Person 29 discovered the theft, his/her spouse called USAA. USAA replaced the money immediately. Person 29 stated that he/she did not know Person 28—the name used to create the PayPal account that received funds from Person 29's USAA account.
26. PayPal records show that on June 9, 2017 at approximately 1:41 PM Central Daylight Time, \$1,000 was transferred to PayPal xx7126 from a USAA Bank account belonging to Person 30. By 7:19 PM Central Daylight Time, all the funds had been exhausted through purchases made at various Wal-Mart stores in and around Columbus, Ohio.
27. USAA records show that the funds were transferred out of Person 30's bank account to somebody with the first initial matching that of Person 28's first name and the same last name as Person 28. The account was subsequently credited for the fraudulent transfer.

Email Fraud Scheme - Money Laundering

28. According to records from the Ohio Secretary of State, Oduro established PW Logistics by filing an Articles of Organization with the Ohio Secretary of State located in Columbus, Ohio on February 12, 2016.

29. According to bank records, Oduro opened Huntington Bank personal bank account xx0449 (HNB xx0449) on January 10, 2018. He was the only signer on the account.
30. According to bank records, Oduro opened Huntington Bank business bank account xx8943 (HNB xx8943) in the name of PW Logistics on August 29, 2018 at a bank branch located in Columbus, Ohio. He was the only signer on the account.
31. According to bank records, Oduro opened TD Bank personal bank account xx5247 (TD xx5247) on July 23, 2019. He was the only signer on the account.
32. According to bank records, Oduro opened TD Bank personal bank account xx3936 (TD xx3936) on August 14, 2019. He was the only signer on the account.

Person 38

33. According to an interview with Person 38, whose identity is known to the affiant, Person 38 received an email from a company she believed to be named Horizon Cargo Shipping in late 2017. The email informed Person 38 that her late husband, who had died in 2009, had allegedly stored valuable artwork and other items in Atlanta, Georgia. The story seemed plausible to Person 38 because her husband had travelled extensively. Person 38 sent money to Oduro and others in relation to attempts to receive these assets. The funds were not used for the stated purpose.
34. Bank records show that, on September 17, 2018, Person 38 wired \$100,000 to HNB xx8943, controlled by Oduro.
35. Bank records show that, after receiving the funds and on or about the dates set forth below, Oduro conducted the following financial transactions involving the proceeds of wire fraud to conceal or disguise the nature, location, source, ownership, or control of the proceeds:
 - a. September 18, 2018 - \$5,000 transfer to HNB xx0449, controlled by Oduro;
 - b. September 19, 2018 - \$20,000 check issued to company controlled by a third party;
 - c. September 24, 2018 - \$6,000 transfer to HNB xx0449;
 - d. October 3, 2018 - \$6,000 cash withdrawal at a bank branch located in Westerville, Ohio;
 - e. October 4, 2018 - \$8,000 cash withdrawal at a bank branch located in Westerville, Ohio;

- f. October 9, 2018 - \$4,000 cash withdrawal at a bank branch located in Westerville, Ohio;
 - g. October 9, 2018 - \$20,000 check issued to a company controlled by a third party;
 - h. October 12, 2018 - \$2,000 cash withdrawal at a bank branch located in Westerville, Ohio;
 - i. October 18, 2018 - \$3,000 transfer to HNB xx0449.
- 36. Bank records show that, on November 28, 2018, Person 38 wired \$25,000 to HNB xx8943, controlled by Oduro.
- 37. Bank records show that, after receiving the funds and on or about the dates set forth below, Oduro conducted the following financial transactions involving the proceeds of wire fraud to conceal or disguise the nature, location, source, ownership, or control of the proceeds:
 - a. November 29, 2018 - \$15,000 check issued to a company controlled by a third party;
 - b. November 30, 2018 - \$2,000 transfer to HNB xx0449.
- 38. Bank records show that, after receiving the funds described above into HNB xx0449 and on or about the dates set forth below, Oduro conducted the following financial transactions involving the proceeds of wire fraud to conceal or disguise the nature, location, source, ownership, or control of the proceeds:
 - a. December 3, 2018 - \$340 cash withdrawal from an ATM located in Columbus, Ohio;
 - b. December 3, 2018 - \$200 cash withdrawal from an ATM located in Columbus, Ohio.
- 39. Bank records show that, on January 16, 2019, Person 38 wired \$10,000 to HNB xx8943, controlled by Oduro.
- 40. Bank records show that, after receiving the funds and on or about the dates set forth below, Oduro conducted the following financial transactions involving the proceeds of wire fraud to conceal or disguise the nature, location, source, ownership, or control of the proceeds:
 - a. January 22, 2019 - \$500 transfer to HNB xx0449;
 - b. January 22, 2019 - \$400 transfer to HNB xx0449;

- c. January 28, 2019 - \$600 transfer to HNB xx0449;
 - d. February 1, 2019 - \$2,000 cash withdrawal at a bank branch located in Columbus, Ohio;
 - e. February 4, 2019 - \$460 cash withdrawal at an ATM located in Columbus, Ohio;
 - f. February 5, 2019 - \$500 cash withdrawal at an ATM located in Columbus, Ohio.
41. Bank records show that, on April 26, 2019, Person 38 wired \$63,800 to HNB xx8943, controlled by Oduro.
42. Bank records show that, after receiving the funds and on or about the dates set forth below, Oduro conducted the following financial transactions involving the proceeds of wire fraud to conceal or disguise the nature, location, source, ownership, or control of the proceeds:
- a. April 29, 2019 - \$3,900 transfer to HNB xx0449;
 - b. April 29, 2019 - \$900 transfer to HNB xx0449;
 - c. April 29, 2019 - \$11,500 issuance of a check payable to a shipping company;
 - d. May 2, 2019 - \$2,000 transfer to HNB xx0449;
 - e. May 7, 2019 - \$16,846 purchase of an official check payable to an online automobile auction company;
 - f. May 9, 2019 - \$3,000 transfer to HNB xx0449;
 - g. May 28, 2019 - \$1,000 transfer to HNB xx0449;
 - h. May 28, 2019 – a second \$1,000 transfer to HNB xx0449;
 - i. June 3, 2019 - \$2,000 transfer to HNB xx0449;
 - j. June 4, 2019 - \$2,000 cash withdrawal;
 - k. June 5, 2019 - \$1,000 transfer to HNB xx0449;
 - l. June 11, 2019 - \$1,200 transfer to HNB xx0449;
 - m. July 3, 2019 - \$1,500 transfer to HNB xx0449;
 - n. July 8, 2019 - \$1,100 transfer to HNB xx0449.

43. Bank records show that, after receiving the funds detailed above into HNB xx0449 and on or about the dates set forth below, Oduro conducted the following financial transactions involving the proceeds of wire fraud to conceal or disguise the nature, location, source, ownership, or control of the proceeds:

- a. April 29, 2019 - \$700 transfer via Wave, a digital remittance company;
- b. April 20, 2019 - \$1,330 transfer via Zelle, a digital remittance company;
- c. May 1, 2019 - \$200 cash withdrawal at an ATM located in Columbus, Ohio;
- d. May 10, 2019 - \$1,000 transfer via Wave;
- e. May 10, 2019 - \$500 transfer via Wave;
- f. May 28, 2019 - \$1,000 transfer via Zelle;
- g. May 28, 2019 – a second \$1,000 transfer via Zelle;
- h. June 3, 2019 - \$500 transfer via Wave;
- i. June 3, 2019 - a second \$500 transfer via Wave;
- j. June 12, 2019 - \$700 transfer via Wave;
- k. June 12, 2019 - \$400 transfer via Wave;
- l. July 3, 2019 - \$525 transfer via Zelle.

44. Bank records show that between September 25, 2019 and March 10, 2020, Person 38 wired \$50,000 to TD xx5247 and a total of \$100,000 to TD xx3936, both controlled by Oduro. Bank records also show that, after receiving the funds, Oduro conducted additional financial transactions involving the proceeds of wire fraud to conceal or disguise the nature, location, source, ownership, or control of the proceeds. Most of these transactions occurred while Oduro was outside the Southern District of Ohio.

Further Information Regarding Search Warrant on Oduro's Phone

45. The search warrant executed on Oduro's phone revealed that he made statements, which are revealing about his state of mind, including the following:

- a. On February 7, 2016, Oduro engaged in a conversation with a third party via WhatsApp. Oduro stated, "Half of the time I'm in a tie, even when I go to withdraw my fraud money..."

- b. On February 8, 2016, Oduro engaged in a conversation with a third party via WhatsApp. Oduro stated, "This is the only business in America I can do and make 20k in a month and not get arrested...I'm locating money, I'm not fraud anyone...It's called money laundering."
- c. On March 8, 2016, Oduro engaged in a conversation via WhatsApp with a third party. During the conversation, Oduro asked the third party if he needed a bank statement. The third party replied that Oduro did not need a bank statement. Oduro replied, "Okay because my bank statement de3 (sic) fraud written all over it...Lol but I'm trying to keep one clean account for this year."
- d. From approximately September through November of 2016, Oduro engaged in conversations with a would-be victim via a text messaging app on his phone. Oduro assumed the identity of Caroline Emily Randolph. The conversation was entirely predicated upon a supposed romantic relationship between the would-be victim and "Randolph." During the conversation, "Randolph" requested money and electronics from the would-be victim numerous times.

Conclusion

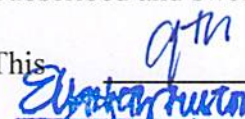
46. Based on the information presented in this affidavit, I contend there is probable cause to believe that Oduro committed Bank Fraud, in violation of 18 U.S.C. § 1344; Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A; and Money Laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(i). I further believe that these violations occurred in the Southern District of Ohio.



Shawn A. Mincks
Special Agent, IRS-CI

Subscribed and sworn to before me

This 9th day of February, 2022.


Elizabeth A. Preston Deavers
United States Magistrate Judge

ELIZABETH A. PRESTON DEAVERS
United States Magistrate Judge